

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

NEIMAN MARCUS GROUP LTD LLC, *et al.*,¹

Reorganized Debtors.

)
)
) Chapter 11
)
) Case No. 20-32519 (DRJ)
)
) (Jointly Administered)
)

**CERTIFICATE OF NO OBJECTION TO LIQUIDATING TRUSTEE'S MOTION FOR
ENTRY OF AN ORDER: (A) AUTHORIZING THE LIQUIDATING TRUSTEE TO FILE
UNDER SEAL THE CONFIDENTIAL SETTLEMENT AND RELEASE AGREEMENT
AS EXHIBIT A TO THE STIPULATION AND AGREED ORDER APPROVING THE
CONFIDENTIAL SETTLEMENT AND RELEASE AGREEMENT BETWEEN
THE REORGANIZED DEBTORS, THE LIQUIDATING GUC TRUST,
AND JUAN INGA; AND (B) GRANTING RELATED RELIEF**

[Related Docket No. 3150]

The undersigned hereby certifies as follows:

On December 9, 2022, the *Motion For Entry Of An Order: (A) Authorizing The Liquidating Trustee To File Under Seal The Confidential Settlement And Release Agreement As Exhibit A To The Stipulation And Agreed Order Approving The Confidential Settlement And Release Agreement Between The Reorganized Debtors, The Liquidating GUC Trust, And Juan Inga; And (B) Granting*

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Reorganized Debtor's federal tax identification number, are: Neiman Marcus Group LTD LLC (9435); Bergdorf Goodman Inc. (5530); Bergdorf Graphics, Inc. (9271); BG Productions, Inc. (3650); Mariposa Borrower, Inc. (9015); Mariposa Intermediate Holdings LLC (5829); NEMA Beverage Corporation (3412); NEMA Beverage Holding Corporation (9264); NEMA Beverage Parent Corporation (9262); NM Bermuda, LLC (2943); NM Financial Services, Inc. (2446); NM Nevada Trust (3700); NMG California Salon LLC (9242); NMG Florida Salon LLC (9269); NMG Global Mobility, Inc. (0664); NMG Notes PropCo LLC (1102); NMG Salon Holdings LLC (5236); NMG Salons LLC (1570); NMG Term Loan PropCo LLC (0786); NMG Texas Salon LLC (0318); NMGP, LLC (1558); The Neiman Marcus Group LLC (9509); The NMG Subsidiary LLC (6074); and Worth Avenue Leasing Company (5996). The Reorganized Debtors' service address is: One Marcus Square, 1618 Main Street, Dallas, Texas 75201.

Related Relief [Docket No. 3150] (the “Motion”) was filed with the Court by the trustee for the Liquidating GUC Trust.

1. Responses, if any, to the Motion were required to have been filed with the Court on or before December 30, 2022 (the “Response Deadline”).

2. The Response Deadline has passed and no responsive pleading to the Motion has appeared on the Court’s docket in the above-captioned chapter 11 cases or was served upon the undersigned counsel. Accordingly, the undersigned respectfully requests that the form of Order granting the Motion attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

Dated: January 3, 2023

/s/ Michael D. Warner

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*Counsel for the Liquidating GUC Trust and Mohsin
Meghji, in His Capacity as Trustee of the Liquidating
GUC Trust*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January, 2023, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner
Michael D. Warner